

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

BMG RIGHTS MANAGEMENT (US) LLC, and)	
ROUND HILL MUSIC LP,)	
)	
Plaintiff,)	Case No. 1:14-cv-1611 (LOG/JFA)
)	
v.)	
)	
COX ENTERPRISES, INC., COX)	
COMMUNICATIONS, INC., and)	
COXCOM, LLC,)	
)	
Defendants.)	

COX’S PROPOSED VOIR DIRE QUESTIONS

Defendants Cox Communications, Inc. and Coxcom, LLC (“Cox”) submit these proposed voir dire questions. Cox reserves the right to supplement these proposed voir dire with additional questions at any time prior to the beginning of trial and for all other purposes contemplated by the Local Rules.

Cox's Proposed Voir Dire

1. What is the highest level of education you have attained?
2. If you hold any degrees from an institution of higher education, in what area of study is your degree in?
3. Are you involved in any hobbies, clubs or organizations? Do you hold any position of leadership (board member, secretary, etc.) for any of these organizations?
4. Have you ever been a plaintiff, a defendant, or a witness in a lawsuit? Please explain.
5. Have you ever served as a juror in a lawsuit? When? What did the case(s) involve?
Where you ever the jury foreperson?
6. I am going to read to you a list of names representing the parties in this case. For those who recognize any of the party names, please answer the following questions:
 - Are you personally acquainted with any current or former officer, director, or employee of any of those companies?
 - Do you or any family member have any financial relationship, past or present with any of these companies?
 - Do you, any family member, or anyone close to you have any strong feelings, positive or negative, toward any of these companies?
7. Do you subscribe to a home Internet service? What type? Who is your Internet service provider?
8. Do you subscribe to a cable television service? Who is your cable television provider?
9. Do you subscribe to a home telephone service? Who is your telephone service provider?
10. I am now going to read to you a list of the attorneys and law firms involved in this litigation.

- Are you related to, or personally acquainted with, any of those attorneys, or have you ever been represented by any of those attorneys or other associates or members of the listed law firms?
- Do you know anyone employed by or through these attorneys and law firms?

11. Do you have any personal knowledge of this case, or have you read or heard it discussed, or have an opinion regarding it? Please explain.

12. I am now going to read to you a list of the individuals who might appear as witnesses in this case.

- Are you related to, or personally acquainted with, any of those individuals?

13. If you are married or live with a partner, what is your spouse or partner's current employment?

14. With how many people live with you in your home?

15. Do you have any children?

- If so, what are their ages?

16. Do you have any particularly positive or negative feelings about Internet service providers or cable companies?

17. Have you ever been terminated as a subscriber by an Internet service provider? If so, what was the reason?

18. Do you or someone close to you have experience with cable or internet service provider companies, beyond being a subscriber? If yes, please explain.

19. Have you or anyone in your household ever downloaded music or a song from the internet? If so, how often?

20. Do you or someone close to you have experience with copyrights, music, or musical artists, either personally or for a company you have worked for? If yes, please explain.
21. Do you or someone close to you have any experience with patents, trademarks or copyrights? If yes, please explain.
22. Do you or someone close to you have experience with the music industry or do you play music professionally? If yes, please explain.
23. Do you have any experience with music licensing or royalties agreements? If yes, please explain.
24. Do you have any special disability or problem that would make it difficult or impossible for you to serve as a member of the jury in this case?
25. This trial is expected to last ____ days/weeks and should be finished by (enter date).
Is there any reason why you cannot serve as a juror for this period of time?
26. Now, considering all of the questions previously asked, is there any reason why any one of you could not sit on this jury and render a fair and impartial verdict based on the evidence presented here in the courtroom and based on the law as will be given to you by the Court?

Dated: November 24, 2015

Respectfully submitted,

/s/ Craig C. Reilly

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CERTIFICATE OF SERVICE

I hereby certify that on November 24, 2015, the foregoing was filed and served electronically by the Court's CM/ECF system upon all registered users.

/s/ Craig C. Reilly

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